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2015 APR 13 AM 10 18

U.S. DISTRICT COURT  
DISTRICT OF MASS.  
UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**FILED UNDER SEAL**

UNITED STATES OF AMERICA )

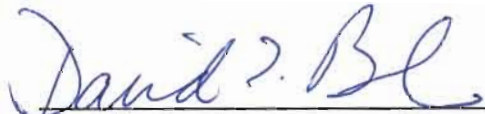
v. )

DZHOKHAR TSARNAEV )

CRIMINAL NO. 13-10200-GAO

Defendant, Dzhokhar Tsarnaev, by and through counsel, requests that the Court include the attached jury instructions concerning (1) nondiscrimination and (2) victim impact evidence as part of the preliminary penalty phase instructions to the jury at the start of the sentencing phase of this case.

Respectfully submitted,

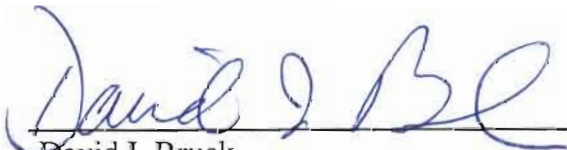


David I. Bruck  
Judy Clarke  
Miriam Conrad  
Timothy Watkins  
William Fick

April 13, 2015

**Certificate of Service**

I certify that the within requested instructions were personally served upon counsel for the government this date.



David I. Bruck